

JEFFREY M. SHOHET (Cal. Bar No. 067529)  
jeffrey.shohet@dlapiper.com  
BROOKE KILLIAN KIM (Cal. Bar No. 239298)  
brooke.kim@dlapiper.com  
KELLIN CHATFIELD (Cal. Bar No. 288389)  
kellin.chatfield@dlapiper.com  
**DLA PIPER LLP (US)**  
401 B Street, Suite 1700  
San Diego, CA 92101-4297  
Tel: 619.699.2700  
Fax: 619.699.2701

RAJIV DHARNIDHARKA (Cal. Bar No. 234756)  
rajiv.dharnidharka@dlapiper.com  
**DLA PIPER LLP (US)**  
2000 University Avenue  
East Palo Alto, CA 94303-2214  
Tel: 650.833.2000  
Fax: 650.833.2001

Attorneys for Plaintiff and Counter-Defendant  
GSI Technology, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

GSI TECHNOLOGY, INC., a Delaware  
Corporation,

Plaintiff and Counter-Defendant,

v.

UNITED MEMORIES, INC., a Colorado  
Corporation, and INTEGRATED  
SILICON SOLUTION, INC., a Delaware  
Corporation,

Defendants and Counter-Claimants.

CASE NO. 13-CV-1081-PSG

**DECLARATION OF BROOKE KILLIAN  
KIM IN SUPPORT OF PLAINTIFF'S  
OPPOSITION TO MOTION FOR  
SUMMARY JUDGMENT OF  
DEFENDANT UNITED MEMORIES, INC.**

Complaint: Filed March 8, 2013

Courtroom: 5

Judge: Hon. Paul S. Grewal

Hearing Date: February 3, 2015

Hearing Time: 10:00 a.m.

1 I, Brooke Killian Kim, declare as follows:

2 1. I am an attorney at the law firm DLA Piper LLP (US) and counsel of record for  
3 Plaintiff GSI Technology, Inc. (“GSI”) in the above-captioned action. I am a member in good  
4 standing of the State Bar of California and have been admitted to practice law before this Court. I  
5 have personal knowledge of the facts set forth in this Declaration, and if called as a witness, could  
6 and would testify competently to such facts under oath.

7 2. I submit this declaration in support of GSI’s Opposition to Motion for Summary  
8 Judgment of United Memories, Inc. (“UMI”).

9 3. Attached as Exhibit A to this declaration is a true and correct copy of the UMI-GSI  
10 Product Design and Development Agreement 576 Mb Low Latency DRAM, produced in this  
11 litigation with Bates numbering GSI0007481-97.

12 4. Attached as Exhibit B to this declaration are true and correct copies of excerpts  
13 from the Deposition of David Chapman, taken in this matter on May 29, 2013.

14 5. Attached as Exhibit C to this declaration are true and correct copies of excerpts  
15 from the Deposition of Ramaa Iyer, taken in this matter on May 21, 2013.

16 6. Attached as Exhibit D to this declaration is a true and correct copy of a document  
17 produced by UMI in this litigation with Bates numbering UMI\_0001784-85.

18 7. Attached as Exhibit E to this declaration is a true and correct copy of a document  
19 produced by UMI in this litigation with Bates numbering UMI\_0012116.

20 8. Attached as Exhibit F to this declaration is a true and correct copy of GSI  
21 Technology, Inc.’s Supplemental Responses to Defendants United Memories, Inc. and Integrated  
22 Silicon Solution, Inc.’s Request for Disclosure of Trade Secrets, served August 13, 2014;

23 9. Attached as Exhibit G to this declaration is a true and correct copy of a document  
24 produced by UMI in this litigation with Bates numbering UMI\_0001159-80.

25 10. Attached as Exhibit H to this declaration is a true and correct copy of a document  
26 produced by GSI in this litigation with Bates numbering GSI10350317.

27 11. Attached as Exhibit I to this declaration are true and correct copies of excerpts  
28 from the Deposition of Didier Lasserre, taken in this matter on May 31, 2013.

12. Attached as Exhibit J to this declaration are true and correct copies of excerpts from the Deposition of Lee-Lean Shu, taken in this matter on May 24, 2013.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: January 13, 2015

/s/ Brooke Killian Kim  
BROOKE KILLIAN KIM